

Mark C. Mao, CA Bar No. 236165
 Beko Reblitz-Richardson, CA Bar No. 238027
 Erika Nyborg-Burch (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
 44 Montgomery St., 41st Floor
 San Francisco, CA 94104
 Tel.: (415) 293-6800
 mmao@bsflfp.com
 brichardson@bsflfp.com
 enyborg-burch@bsflfp.com

James Lee (admitted *pro hac vice*)
 Rossana Baeza (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
 100 SE 2nd St., 28th Floor
 Miami, FL 33131
 Tel.: (305) 539-8400
 jlee@bsflfp.com
 rbaeza@bsflfp.com

Amanda K. Bonn, CA Bar No. 270891
SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Tel: (310) 789-3100
 Fax: (310) 789-3150
 abonnn@susmangodfrey.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody
 (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander Frawley (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P.
 1301 Avenue of the Americas,
 32nd Floor
 New York, NY 10019
 Tel.: (212) 336-8330
 bcarmody@susmangodfrey.com
 srabin@susmangodfrey.com
 ssh Shepard@susmangodfrey.com
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)
 Ryan J. McGee (admitted *pro hac vice*)
MORGAN & MORGAN
 201 N. Franklin Street, 7th Floor
 Tampa, FL 33602
 Tel.: (813) 223-5505
 jyanchunis@forthepeople.com
 mram@forthepeople.com
 rmcgee@forthepeople.com

Michael F. Ram, CA Bar No. 104805
MORGAN & MORGAN
 711 Van Ness Ave, Suite 500
 San Francisco, CA 94102
 Tel: (415) 358-6913
 mram@forthepeople.com

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF MARK MAO IN
 SUPPORT OF PLAINTIFFS'
 ADMINISTRATIVE MOTION TO
 SUPPLEMENT THEIR SANCTIONS
 MOTION**

The Honorable Susan van Keulen

DECLARATION OF MARK MAO

I, Mark Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 7-11(b), I submit this Declaration in Support of Plaintiffs' Administrative Motion to Supplement their Sanctions Motion. Plaintiffs' proposed supplement is attached hereto as Exhibit A.

3. On December 22, 2021, Plaintiffs Served Interrogatory No. 35, which asked:

[REDACTED]

4. Google served its response to this Interrogatory on January 28, 2022, stating:

[REDACTED]
[REDACTED] See Exhibit B.

5. On May 12, 2022—over two months after the March 4, 2022 close of fact discovery, and almost one month after the parties' April 15, 2022 deadline to serve opening expert reports, Google amended its response to Interrogatory No. 35. [REDACTED]

[REDACTED]
[REDACTED]

6. Plaintiffs now respectfully seek leave to submit a supplement to their Sanctions Motion (Dkt. 430), including to address Google's supplemental interrogatory response.

7. My colleague emailed counsel for Google, attaching Plaintiffs' proposed supplement and asking for Google's position on this Administrative Motion. Counsel for Google has not yet taken a position.

8. As a result, Plaintiffs were unable to obtain a stipulation from Google.

9. Attached hereto as **Exhibit A** is Plaintiffs' proposed supplement to their Sanctions Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 16th day of May, 2022 in San Francisco, California.

DECLARATION OF MARK MAO
Case No. 4:20-cv-03664-YGR-SVK